

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No. 22-20369-CR-CMA

UNITED STATES OF AMERICA

vs.

ARIELLE SY'MON MANSAW,

Defendant.

FACTUAL PROFFER

If this case had gone to trial, the United States would have proven beyond a reasonable doubt that **ARIELLE SY'MON MANSAW** conspired with individuals known and unknown to the United States to launder funds obtained from a scheme and artifice to defraud an FDIC insured victim bank (the "Victim Bank") located in Texas by means of materially false or fraudulent pretenses, representations and promises with the intent to deceive the Victim Bank and obtain money that **MANSAW** and her co-conspirators were not entitled. Specifically, the specified unlawful activity in this scheme involved the creation of false and fraudulent synthetic identities. The false and fraudulent identities were used to induce a victim bank located in Texas into extending credit to accounts in the name of the synthetic identities. The money received into the synthetic identity accounts was used to fuel the fraud scheme and unjustly enrich members of the conspiracy. **MANSAW** laundered hundreds of thousands of stolen Victim Bank funds through bank accounts she controlled.

The Defendant

**MANSAW** resided in Miami, Florida. **MANSAW** was the girlfriend of Hasan

Hakim Brown, the leader and organizer of this scheme.

MANSAW was the president and/or registered agent of the following shell companies. None of the companies below engaged in legitimate business, rather they were used to receive and launder funds from the Victim Bank:

Y.E.N. Global LLC  
("Y.E.N. Global")  
EIN: 46-4467748

Y.E.N. Consulting Group Inc.  
("Y.E.N. Consulting")  
EIN: 81-5010030

White Glove Yacht Cleaning Services Inc.  
("White Glove")  
EIN: 83-2485164

Unclutter My Life  
("Unclutter")  
EIN: 84-1979912

**The Specified Unlawful Activity: Bank Fraud**

At the direction of Hasan Hakim Brown, members of the bank fraud conspiracy, including Brown, Lorin Saunders, and Raul Gonzalez, among others, logged into a virtual office, located in the Southern District of Florida, and used a virtual workspace to assign stolen social security numbers (also known as "CPNS") to fictitious identities (e.g. fictitious names, dates of birth, addresses, phone numbers, and email addresses) created by Brown and other co-conspirators. Once stolen social security numbers were added to the fictitious identities, members of the conspiracy used various techniques to assign the newly created Synthetic IDs favorable credit scores. Once the Synthetic IDs were complete, members used the Synthetic IDs to apply for bank accounts and credit with the

Victim Bank, in violation of Title 18, United States Code, Section 1344 and 1349.

**Laundering**

**MANSAW's** shell companies received, and laundered money obtained from this scheme. A significant portion of that money was then forwarded on to shell companies controlled by Hasan Hakim Brown and other members of the conspiracy. A portion of the stolen money was used for **MANSAW's** personal expenses.

For example, in July of 2019, members of the conspiracy caused a Victim Bank convenience check<sup>1</sup> payment of \$8,471 to **MANSAW's** shell company Y.E.N. Global. The payment was from a Synthetic ID in the name of Amanda Jones. Subsequently, **MANSAW** knowing that the payments to Y.E.N. involved proceeds of some unlawful activity, made two check payments from Y.E.N. Global in the amount of \$8,471 to Hasan Hakim Brown's shell companies Local Screen Kings and Post Commercial Property Management. **MANSAW** knew that the transactions were designed in whole or in part to disguise the nature, location, source, ownership, or control of the unlawful activity.

Similarly, members of the conspiracy caused payments totaling approximately \$41,419 from Synthetic ID accounts at the Victim Bank in the names of Sergio Lopez, Dean Martin, and Michael Bennett to Y.E.N. Global and YEN Consulting. Of the approximately \$41,419 received into **MANSAW's** accounts, **MANSAW** sent approximately \$31,527.20 to shell companies controlled by Brown, knowing that the financial transactions involved the proceeds of some unlawful activity, and that the transactions were designed in whole or in

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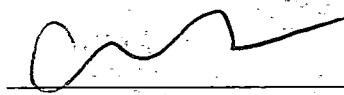
<sup>1</sup> Convenience checks are blank checks that lenders, usually credit card issuers or home equity line of credit lenders, offer to their customers. The borrowers can use these checks to pay off balances on other cards, make new purchases, or secure a cash advance.

part to disguise the nature, location, source, ownership, or control of the proceeds of the unlawful activity. The remaining funds were used to pay MANSAW's credit card. In addition to laundering money into accounts controlled by Hasan Hakim Brown, MANSAW also helped to launder proceeds from other co-conspirators' bank accounts including Lorin Saunders and Raul Gonzalez.

In total, MANSAW knowingly laundered hundreds of thousands of Victim Bank money through shell company bank accounts she controlled.

MARKENZY LAPOINTE  
UNITED STATES ATTORNEY

Date: 1-9-23 By:

  
Amanda Perwin  
ASSISTANT UNITED STATES ATTORNEY

Date: 1-9-23 By:

  
Brian Kiflew  
ATTORNEY FOR DEFENDANT

Date: 1/9/23 By:

  
Arielle Sy'mon Mansaw  
DEFENDANT